Cross reference of comment letter number with the specific individual/group/organization making the comment.

| **Table 1:**Comment Cross Reference Table | |
|---|---|
| **Comment Letter #** | **Individual, Organization, or Agency** |
| 1 | Vince Colucci |
| 2 | Jean Public |
| 3 | Sara Johnson – Native Ecosystems Council (NEC) and Michael Garrity – Alliance for the Wild Rockies (AWR) |
| 4 | Julie A. DalSoglio - Environmental Protection Agency (EPA) |
| 5 | Hans Humbert |
| 6 | Heidi Heirchy |
| 7 | Jim Olsen - Montana Fish, Wildlife, and Parks (FWP) |
| 8 | Nancy Schultz |
| 9 | Pat Flowers – Montana Fish, Wildlife, and Parks (FWP) |

The following table summarizes the public comments received during scoping and describes how each comment was addressed during the analysis process. The full content of letters and emails are available in the public involvement section of the project file. Please refer to the table above to cross-reference the letter number with the person making the comment.

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
|---|---|---|---|
| 1 | I have no significant issue with the current scope outlined | Statement, no cause-effect | Thank you for your support for the domestic livestock grazing project. |
| 1 | I do believe that the lands described (not wilderness) require better forest stewardship and less motor vehicle access. Retrieving the grazing cattle shouldn't be an exclusion to this | Scope of Project | Our stewardship of the lands within the eleven allotments will be based on Forest Plan Standards for livestock grazing. The Range section in Chapter 3 of the DEIS, discusses the permit process the permittee's go through to use motorized access to the grazing allotments for maintenance and repairs. |
| 1 | The wolf management plan in this area needs some teeth, if you will pardon the pun. | Scope of Project | Wolves were delisted in May 2011. Delisting allows Montana to manage wolves in a manner similar to how bears, mountain lions and other wildlife species are managed, guided by state management plans and laws. The Forest Service does not manage wolves and changes to the Montana Wolf Management Plan would be conducted by Montana Fish Wildlife and Parks. |
| 1 | The ungulate wildlife has been devastated by the wolves. | Statement, no cause-effect, Analysis, | Impacts to elk from this project will be analyzed in detail, including impacts from other past, present, and future actions with detailed population information. |
| 2 | all these cattle should be thrown off national lands. | Statement, no cause-effect | In Chapter 2 of the DEIS, the No Action alternative outlines no livestock on the allotments. Chapter 3 discusses the effects of this alternative on the various resources. |
| 2 | the rmp is a sick tawdry allocation of land owned by every citizen int he usa to the cattle profiteers, who abuse those animals | Statement, no cause-effect | The National Forest Multiple Use - Sustained Yield Act of 1960 (Public Law 86-517), authorizes national Forests to develop and administer the lands for renewable resources, including Range. The Range Allotment Management Plan (RMP) is the tool the Forest uses to implement this use. |

| **Table 2:** Scoping Comments | | | |
|---|---|---|---|
| **Letter #** | **Comment/Concern** | **Type of Comment** | **Response to Comment/ How Comment was Addressed** |
| 2 | this plan sucks to high heaven. it does nothing for the national citizens who own this land. national citizens are being ripped off by the cattle ranchers who pay cheap cheap cheap lease rates. | Statement, no cause-effect | The permittee's are part of the nation's citizenry. |
| 2 | these cattle ranchers could never find any private land owner willing to rent for the cheap cheap cheap rates they pay the national owners of that land. the fs doesnt own that land. the national citizenry does and the usda has been allowing this rip off to occur for years now. its time for a change. | Statement, no cause-effect | The Forest Service is the care taker of the lands within the National Forest boundary and this project follows direction outlined in law, regulation, and policy. |
| 2 | the authorized number of heads of cattle should be reduced to zero. send the cattle to priate land owners. | Alternative | In Chapter 2 of the DEIS, the No Action alternative outlines no livestock on the allotments. Chapter 3 discusses the effects of this alternative on the various resources. |
| 2 | usda has gotten away with this murder of natural animals and birds for years. its time tos top their marauding. usda doesnt own this land. national citizens do. we say stop the murder. | Statement, no cause-effect | This project does not authorize the killing of any natural animals or birds. In Montana, Fish, Wildlife, and Parks regulate hunting. |
| 2 | this comment is for thepublic record. | Statement, no cause-effect | Your comments will be part of the disclosure documentation for this project. |
| 2 | american citizens have no obligation to let them pay peanuts for using our land and destroying all the natural animals and birds that need to live on that land. | Statement, no cause-effect/Analysis | Impacts to native wildlife will be analyzed in Chapter 3, in the Wildlife Section. |
| 3 | Also please define how the grazing impacts on westslope cutthroat trout on 8 of the allotments will be assessed as per viability of this sensitive species, and provide the monitoring data that is being used for this assessment and management of riparian grazing impacts. | Analysis | As identified in Ch. 3 under methodology in the Aquatics section, we disclose how viability of Westslope Cutthroat Trout (WCT) will be assessed. A summary of the monitoring findings are disclosed in the Aquatics section of Chapter 3. The detailed field information can be found in Appendix B6. |
| 3 | Please define the short and long term grazing impacts on key watersheds in the Seymour and Mussigbrod allotments. | Analysis | Grazing impacts to all watersheds within the project area, including Seymour and Mussigbrod allotments, can be found in the Hydrology Section of Chapter 3. |

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
|---|---|---|---|
| 3 | There is no MIS in the Forest Plan for small mammals, even though many of these are intolerant of grazing, or for songbirds associated with riparian areas, especially dense shrubbery. Please provide an MIS via a Forest Plan amendment for these species, and define what monitoring will be in place to address grazing impacts over time. | Analysis | This project uses the identified Forest Plan MIS. The courts have upheld the Forest Plan including the MIS. Based on the Design Features/Mitigation Measures 5,6,8,9 in Chapter 2, the project will provide protection for small mammals and song birds. Monitoring for each allotment can be found in Chapter 2, as part of the allotment specific allotment description. |
| 3 | We have very high concerns about the cmnulative impacts of livestock grazing on aspen habitats. It appears that this impact is slowly eliminating aspen due to a failure of regeneration. Please provide a complete inventory of all aspen stands on these allotments, define their level of successful regeneration, and how the agency intends to address this serious problem. | Action/Analysis | In Chapter 3 in the Range Section, under existing condition it discloses the vegetation composition for each allotment and its existing condition. Aspen regeneration is not a part of the Purpose and Need. The Big Hole Landscape Assessment does identify Aspen as a species worthy of management focus, but is not part of this NEPA project. |
| 3 | We are concerned about the cumulative impacts of sagebrush burning that has occurred on these allotments. Please summarize all the past burning that has occurred in the last 30 years. | Action | This information is summarized in Chapter 3 in the Range Section. |
| 3 | Please assess the grazing impacts on sagebmsh habitats on these allotments. | Analysis | This information is summarized in Chapter 3 in the Range Section. |
| 3 | Please clearly define any and all plans to treat ecotones on these allotments to increase forage for livestock. | Analysis | At this time, there are no actions planned to specifically increase the forage in any of the allotments, regardless of which ecotone(s) may cover the allotment. |
| 3 | We also have significant concerns about noxious weeds. Please address how grazing affects weeds, how effective past management has been in addressing this problem, and how changes in the grazing program will be made to address this issue. | Analysis | See the Invasive Plants Analysis section in Chapter 3, for grazing effects on weeds and management effectiveness. See Chapter 2 for alternatives. |
| 3 | Please use the current best science to address the ecological need for ungrazed reserves for wildlife that are intolerant of grazing. | Action/Analysis | Current best science to address the ecological need for un-grazed reserves for wildlife will be analyzed in Chapter 3 in the Wildlife Section. |
| 3 | Please provide a sufficient analysis of the grazing impacts of cowbird parasitism on songbirds, and how any changes in past grazing programs will be implemented to address this serious problem. | Analysis | Analysis of the grazing impacts of cowbird parasitism on songbirds will be analyzed in Chapter 3 in the Wildlife Section. |

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
|---|---|---|---|
| 3 | Please do a complete analysis of existing sagebmsh areas, and define the value of these ecosystems to wildlife, including sage grouse and the pygmy rabbit, as well as Montana Species of Concern and USFWS Birds of Conservation Concern. | Analysis | Analysis of sagebrush, value of these ecosystems to wildlife, including sage grouse and pygmy rabbit, Montana Species of Concern, and USFWS Birds of Conservation Concern can be found in Chapter 3, in the Wildlife Section. |
| 3 | The scoping notice claims there are no threatened or endangered species in this area, which is incorrect. Both grizzly bears and lynx occur. The agency needs to do formal consultation on these species, as well as update the lack of fonnal consultation in the Forest Plan for lynx. | Action | Grizzly bears and lynx will be analyzed in Chapter 3 in the Wildlife Section. The appropriate consultation process will be followed. |
| 3 | Please define the management strategy for dispersal habitat and alternate prey species habitat for the lynx in regards to lower elevation ecotone and sagebmsh habitats. | Action/Analysis | Impacts to lynx, including all habitat types and prey will be analyzed in accordance to the direction in the Northern Rockies Lynx Management Direction Record of Decision. |
| 4 | Water Quality Standards (WQS) are the primary regulatory mechanism used to achieve Clean Water Act goals. WQS establish designated uses for water bodies (or water body segments), support the uses with narrative and numerical water quality criteria, and protect high water quality with an Antidegradation or Nondegradation Policy. Proposed projects should be planned and designed to protect water quality to maintain and/or attain compliance with WQS. | Action/Analysis | This project was designed with the knowledge of existing streams within the project area that are on Montana's 303d list of quality impaired waters. The proposed project is designed with mitigation features, including fencing and adjusted seasons of use to help minimize further impacts to streams. Please see Chapter 2, the Proposed Action and Alternative 4 descriptions for more detailed information of fencing locations and seasons of use. |
| 4 | Wetlands should be included within designations of Riparian Habitat Conservation Areas (RHCAs). We note that temperature effects from riparian canopy/shade removal can persist downstream for significant distance in some small stream systems (e.g., up to IOkm). It is important that proposed activities be consistent with the riparian management objectives described in the ICB Strategy, which include: * Achieve physical integrity of aquatic ecosystems; * Provide an amount and distribution of woody debris sufficient to sustain physical and biological complexity; * Provide adequate summer and winter thermal regulation; * Provide appropriate amounts and distributions of source habitats for riparian- or wetland-dependent species; and * Restore or maintain water quality and hydrologic processes. * Restore or maintain natural! y functioning riparian vegetation communities | Action/Analysis | The Forest Plan on pages 18-21 identifies the applicable standards this project will comply with. Under each resource in Chapter 3, is also listed those other Federal, State and Local laws, regulations, and policies that are applicable. |

| **Table 2:** Scoping Comments | | | |
|---|---|---|---|
| **Letter #** | **Comment/Concern** | **Type of Comment** | **Response to Comment/ How Comment was Addressed** |
| 4 | EIS documents should have a clear and logical purpose and need statement that provides information regarding the administrative or regulatory reasons for this action, such as the expiration of the existing Allotment Management Plans (AMPs) or the need to address the suitability of the area for grazing. | Statement, no cause-effect | As identified in Chapter 1, the Purpose and Need is tied to the 2009 Forest Plan. The specific reasons, (compliance with new Forest Plan, need for site specific AUL's, and suitability) are tied back to the Goals and Objectives for Livestock Grazing on page 25 of the Forest Plan. |
| 4 | We recommend that AMP revisions include restoration of degraded environments and ensure the long-term sustainability of environmental and ecological values. We encourage including "protection, restoration and enhancement of water quality, aquatic habitat, and hydrologic functions" within the purpose of the need statement for the grazing management project (i.e., improving conditions of riparian plant communities, improving water quality and aquatic habitat, reducing streamside trampling by livestock, achieving desirable vegetative conditions, etc.). | Alternative | The Purpose and Need does not include a restoration component. The actions proposed (exclosure's, changes in Season of Use, avoidance periods, site specific Allowable Use Levels, changes in Head Months, etc.) will help move the allotments towards Proper Functioning Condition (PFC), improved water quality, and aquatic habitat. |
| 4 | The overall ecosystem encompassing the analysis area including the location and size of analysis area should be described. | Action/Analysis | In Chapter 1 we have disclosed the location and size of the project area. Because each resource may have a different analysis area, please see the specific resource section in Chapter 3. |
| 4 | The analysis area boundary should include the environment potentially affected by implementation of the alternatives and should be a logical unit for projecting and measuring effects. The area should encompass the potentially affected environment, and serve as a baseline to compare projected impacts and for measuring actual effects. | Action/Analysis | Because each resource may have a different analysis area, please see the specific resource section in Chapter 3. |
| 4 | Ecological requirements may extend beyond the boundaries of the project area, although reasonable limits should be made to the scope of the analysis. If areas of analysis vary for specific resources, indicate how those areas differ and why. | Action/Analysis | In Chapter 3 under each resource section is a discussion of the analysis areas. |

| **Table 2:** Scoping Comments | | | |
|---|---|---|---|
| **Letter #** | **Comment/Concern** | **Type of Comment** | **Response to Comment/ How Comment was Addressed** |
| 4 | Descriptions should be brief statements supported by information that is provided later in the document. In addition, the document should address any resource conditions that are not consistent with the overall objective of maintaining healthy, sustainable rangeland ecosystems and proper functioning condition of streams and riparian areas, and maintenance of Montana Water Quality Standards. This section **(Purpose and Need)** should also include a clear description of the proposed action in specific terms, and identify the official responsible for the decision. | Action | This information can be found in the Existing Condition section in Chapter 3 for the individual resources. The Proposed Action and all the alternatives are described in detail in Chapter 2. |
| 4 | The EIS should support the purpose and need with a range of reasonable alternatives that will meet the objectives of the purpose and need, and address resource and environmental issues and public concerns. | Action | Chapter 2 of the DEIS discloses in detail all the alternatives. Alternative 4 was developed based on scoping comments from the public and internally. |
| 4 | All issues raised during scoping should be identified in the EIS, and issues considered as significant should be clearly stated along with a statement of how they will be addressed in the document. | Action | Issues identified internally and from scoping are disclosed in Chapter 2. This table identifies all the scoping comments and how they were handled. |
| 4 | A brief statement should be provided to indicate how the proposed action complies with the Forest Plan, or how the Plan may have to be amended to accommodate the activity. | Action | In Chapter 2 as part of the alternative discussion, there is a discussion of how it complies with the Forest Plan and the Purpose and Need. |
| 4 | In accordance with NEPA (40 CPR 1502.14) the EIS should: a. Rigorously explore and objectively evaluate all reasonable alternatives. b. Devote substantial treatment to each alternative considered in detail so that reviewers may evaluate their comparative merits. c. Include reasonable alternatives not within the jurisdiction of the lead agency. d. Include a no action alternative. e. Identify the agency's preferred alternative(s). f. Include appropriate mitigation measures not already included in the proposed action or alternatives. | Alternatives | Chapter 2 of the DEIS describes and discloses all the alternatives considered in detail, alternatives not considered in detail, a list of Design Features/Mitigation Measure(s) common to all alternatives, and any alternative specific Design Features/Mitigation Measure(s). |

| **Table 2:** Scoping Comments | | | |
|---|---|---|---|
| **Letter #** | **Comment/Concern** | **Type of Comment** | **Response to Comment/ How Comment was Addressed** |
| 4 | A full range of reasonable alternatives should be developed in response to the significant issues identified during scoping. Such alternatives may include, but not be limited to: • No Action Alternative in which current management activities are maintained; • No Grazing Alternative in which all domestic grazing is removed from the area. The public and decision-makers can better understand grazing impacts if a No Grazing alternative is evaluated, particularly in areas where there are important wildlife species, riparian and watershed resources, intensive recreation demands, and so forth. Reducing or eliminating grazing should be evaluated to protect sensitive resources. Furthermore, various grazing statutes (e.g., Taylor Grazing Act and the Federal Land Policy and Management Act [FLPMA]) also require that the suitability of land be determined for grazing and whether natural resources will be adequately protected. • Alternative pasture rotations, grazing strategies, livestock distribution strategies, and/or adjusted animal unit months (AUMs) to respond to issues. To enhance the natural and human values for recreation and other benefits, management practices should enhance natural, functioning ecosystems in areas important for recreation and wildlife uses. • Alternative management actions such as baok trampling standards, forage utilization standards, stubble height, woody browse use, fencing, riding, exclosures, burning, off-stream watering and other range improvements or practices as appropriate to respond to the issues related to grazing. • Alternatives considered but not given detailed study should be identified along with the rationale for their dismissal. | Alternatives | Chapter 2 of the DEIS describes and discloses all the alternatives considered in detail, alternatives not considered in detail, and a comparison of alternatives. |
| 4 | The CEQ regulations state that an EIS should include the means to mitigate adverse environmental impacts (40 CPR 1502.16(h)), and appropriate mitigation measures not already included in the proposed action or alternatives (40 CPR 1502.14(f)). Mitigation measures common to all action alternatives should be identified along with statements of their effectiveness in minimizing impacts. | Action/Analysis | Chapter 2 discloses information on the Design Features/Mitigation Measures. |

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
|---|---|---|---|
| 4 | EPA suggests that Beaverhead-Deerlodge NF consider mitigation measures that avoid or minimize adverse environmental impacts and/or promote restoration of degraded rangeland resources. Actively manage grazing allotments for grazing frequency, duration, stocking rates, animal distribution, season and timing of forage use, and minimal wildlife use conflicts. Studies show that livestock numbers and intensity have greater effects on herbage production than other grazing practices.<br>o Fence or otherwise protect ecologically productive and sensitive riparian zones.<br>o Eliminate livestock and erect exclosure in areas that are proposed to restore ecological resources or protect sensitive fish and wildlife species.<br>o Permanently or seasonally eliminate or limit livestock numbers and types in areas that are predisposed to damage during periods of high sensitivity.<br>o Vacated grazing allotments, if any, should be considered to remain vacated to provide areas for recovery and future restoration opportunities.<br>o Actively restore (for example, weed control or reseeding of native vegetation) areas that are severely degraded.<br>o Structures or management practices should be considered to stabilize eroded or at-risk stream banks.<br>o Identify "triggers"- drought, natural catastrophes, forage production and condition, and impacts on sensitive native species, for example- that would reduce or remove livestock numbers and duration in an allotment. Incorporate flexibility in allotment permits to account for such special circumstances. Precipitation is a primary determinant in both herbage production and plant diversity.<br>o Prohibit the use of off-road vehicles for grazing management in areas where they conflict with sensitive wildlife or non-motorized recreation areas and users. | Actions/Analysis | As identified in Chapter 2, the Design Features/Mitigation Measures are to help avoid or minimize adverse environmental impacts and helps move the resources toward improvement. |
| 4 | If there are local groups focusing on watershed/ecosystem recovery, we encourage the Beaverhead Deerlodge NF to consider including a watershed or ecosystem restoration alternative for detailed evaluation, or at least to include watershed/ecosystem restoration elements in the reasonable alternatives. | Alternative | A Watershed/Restoration alternative was considered, but not evaluated in detail because it did not meet our Purpose and Need of Updating the grazing management and infrastructure to comply with the applicable 2009 Forest Plan direction. |

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
|---|---|---|---|
| 4 | Water quality improvement or fisheries enhancement projects that are proposed as part of the project alternatives should be clearly described. | Alternatives | Identified in Chapter 2 of the DEIS, the Proposed Action and Alternative 4 identify specific actions to improve water quality and aquatic habitat. |
| 4 | If watershed restoration work will be committed to with the project decision that should be clearly stated. If watershed restoration work is to be carried out only as available funding allows, the potential funding source and likelihood of funding or priority should be identified. | Action | Watershed restoration is not part of the projects Purpose and Need. Many of the actions proposed (rest rotation, deferment of entry, rest, fencing, additional water, and reduction in head months) will help to move the watersheds towards improvement. |
| 4 | We also support the need for monitoring and evaluation and incorporation of principles of adaptive management in the alternatives, and highly support strategies that maintain and/or restore watershed condition and water quality to fully support beneficial uses. | Actions | Each allotment will have Annual Compliance and Long-term rangeland monitoring. This will include monitoring of the site specific Allowable Use Levels (AUL's) that will help to determine if the livestock need to be moved or if other actions need to be taken for the protection of the resources. The site specific AUL's are used instead of other adaptive management tools. |
| 4 | We recommend that tables, maps, figures, charts, photos, etc., be used as much as possible and wherever appropriate to present and display information and specific features of alternatives so that the various alternatives can be clearly understood (e.g., grazing strategies, AUMs, range improvements, exclosures, riding, off-stream watering, prescribed burning, road construction & reconstruction, road obliteration, road improvements, watershed, fisheries, and stream channel improvements, revegetation, weed treatments, etc.). Maps that show allotments and project features in relation to streams and wetlands and other watershed characteristics such as critical fisheries habitat, 303(d) listed stream segments, etc., are particularly useful. | Action | We concur. See the table of context for a list of the maps, figures, graphs, and tables. |
| 4 | It is helpful if the rationale for inclusion and location of grazing strategies, AUMs, and range improvements are discussed. Such rationale enhances public understanding of the proposed project, better achieves the public disclosure purpose of the EIS, and better explains to the public the environmental and resource trade-offs involved in making land management decisions. | Action | We concur. We have identified by pasture and located on maps where there are changes to the infrastructure and described narratively where these actions are occurring. See appendix A for maps and Chapter 2, allotment specific actions, Tables 16-27 for the narratives. |

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
|---|---|---|---|
| 4 | A comparison of the alternatives' responsiveness to the significant issues should be displayed. These summaries should be supported by information presented later in the document, in an appendix, or in referenced specialist reports. Referenced reports should be readily available upon request. | Analysis | In Chapter 2 of the DEIS there is a table that provides a comparison of the alternatives. |
| 4 | We highly recommend that an alternatives matrix table that summarizes major features and significant environmental impacts of alternatives be provided to facilitate understanding of the alternatives, particularly distinctions between alternatives, and provide comparative evaluation of alternatives in a manner that sharply defines issues for the decision maker and the public to make in regard to a reasoned choice among alternatives. | Analysis | We have a table in Chapter 2 of the DEIS that displays the actions by alternative by allotment, along with the associated effects. |
| 4 | A clear description of the decision criteria, both measured and qualitative, that are used to evaluate and select alternatives .would be helpful. | Action | As part of the Record of Decision (ROD), there will be clear disclosure of the decision criteria and how they were used in selecting the alternative to implement. |
| 4 | Also, if there are any proposed nearby actions or adjacent developments that are closely related to the proposed action it would be appropriate to analyze and discuss those related developments as a connected action (40 CFR 1508.25). | Action/Analysis | There are no connected actions associated with this project. A list of Past, Present, and Reasonably Foreseeable Future activities can be found in Chapter 3. |
| 4 | The EIS should succinctly describe the existing conditions and resources (using watershed analysis where applicable) within the analysis area that will be affected by the proposed alternatives. We particularly encourage identification of areas with high demand for recreation use and/or areas with high public interest in preservation, conservation, and or restoration. | Action/Analysis | Chapter 3 of the DEIS discloses the existing condition for each of the applicable resources including recreation and hydrology. |
| 4 | The EIS should also evaluate and disclose all activities and associated environmental impacts related to project implementation. | Analysis | In Chapter 3 of the DEIS, each resource discusses and discloses the effects to their resource by alternative. |
| 4 | Environmental analysis documents should reflect the level of analysis and data<br>compilation actually completed, so that the reviewer is able to establish whether data exists to support conclusions within the analysis. | Analysis | Appendix B of the DEIS contains the field data used by the individual resources in their effects analysis. |

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
|---|---|---|---|
| 4 | The effects analysis should be able to stand on its own. Of particular concern to range management decisions is a discussion of the relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity of the area. This should also include a discussion of any irreversible or irretrievable commitments of resources to be made with each alternative. | Analysis | In Chapter 3 of the DEIS, each resource discusses and discloses the effects to their resource by alternative. The short and long term effects are discussed as well as any potential irreversible or irretrievable commitment of their resource. |
| 4 | The discussion should include analysis of impacts within the analysis area resulting from activities on all lands, regardless of ownership. In accordance with NEPA the EIS section should address (40 CFR 1502.16): a. Direct effects and their significance. b. Indirect effects and their significance. c. Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned. d. The environmental effects of alternatives including the proposed action. e. Energy requirements and conservation potential of various alternatives and mitigation measures. f. Natural or depletable resource requirements and conservation potential of various alternatives and mitigation measures. g. Effects to Historic and cultural resources. h. Means to mitigate adverse environmental impacts. | Action/Analysis | In Chapter 3 of the DEIS each resource will discuss the cumulative effects of past present, and reasonably foreseeable future activates within in their analysis area for each alternative. |
| 4 | We encourage inclusion of tables, figures, and other visual aids to compare all effects associated with each alternative. | Action | We concur. See the table of context for a list of the maps, figures, graphs, and tables. |
| 4 | Sufficient information should help to determine the potential risks to resources and to evaluate risk and uncertainty associated with natural resource protection. | Analysis | This information can be found in Chapter 3, of the DEIS under each resource. |
| 4 | Analyses should determine which alternative(s) best protects overall values. Biological, vegetative, and stream/riparian impacts for each alternative should be accompanied by the evaluation or' their risks and information about potential remedial costs to restore biological functions and values, if available. | Analysis | As part of the analysis for each resource these is a table that compares the effect of each alternative on the resource. The decision maker will review these tables to help them make an informed decision in part based on the risk to and protection of the resources, while still being able to meet the Purpose and Need. |
| 4 | The EIS should disclose how grazing historically has affected soils, water tables, vegetation, erosion, streams, riparian areas, and fisheries uses and wildlife habitat. | Action | In Chapter 3 of the DEIS, each resource discusses and discloses the past activities that have contributed to the existing condition of the resource including past livestock grazing. |

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
|---|---|---|---|
| 4 | EPA recognizes the complexity of environmental impacts and the regional socioeconomic dependence of grazing interests on public lands. EPA's concerns relate to potentially adverse impacts from grazing management on surface and ground water, soils, vegetation, fish and wildlife, and ecosystems. In those situations where the resource condition is expected to move toward a desired condition, this discussion should include an estimation of the length of time it is expected to take to meet the desired condition. This should include a description of benchmark conditions to be monitored to determine the trend of the resource condition, and therefore the relative success of the management strategy. | Action/Analysis | In Chapter 3 of the DEIS each resource discusses and discloses what goals and/or objectives this project will help move the resource towards. Any applicable monitoring for trends is also discussed and disclosed in the Methodology section of each resource. |
| 4 | The EIS should include discussion of the management actions that will be taken by the Agency and future management objectives, and should explain how grazing will be managed to meet management objectives. The discussion should predict rangeland conditions under the various grazing management alternatives, comparing future projected conditions to current condition to evaluate how rangeland management practices will improve the resource. | Alternative | Chapter 2 of the DEIS discusses and discloses the actions proposed by alternative. Chapter 3 discloses a table listing present and future actions within the project area. The Forest Plan on page 25 outlines the objectives for livestock grazing that the forest will be following and that this project will move the forest towards these objectives. In Chapter 3 under the Range section there is a discussion of the changes in Rangeland condition by alternative and the monitoring that is associated with each allotment. |
| 4 | A discussion of Range Management should clearly display the differences between the alternatives and the impacts to the permittee and the overall operation of the allotment. Discussion should also include an analysis of the cost effectiveness of precluding streamside grazing in contrast to permitting grazing supplemented by additional monitoring and mitigation to protect water resources. | Action/Analysis | Effects to the permittee's and the overall management of the allotment is discussed and disclosed in the Range and Social/Economic sections of Chapter 3 of the DEIS. An economic analysis of each alternative can be found in the Social/Economic section of Chapter 3 of the DEIS. |
| 4 | The goal of the Taylor Grazing Act, and numerous Federal statutes that have followed, is to rehabilitate rangelands in the United States. Rehabilitation is to be accomplished partly through controlling the numbers of livestock, protecting riparian areas (fencing and off-stream stock watering), rotating animal herds, and so forth. | Statement, no cause-effect | Although the Purpose and Need does not include a rehabilitation component, we believe that the actions proposed in Alternative 4 and the Proposed Action will help move each allotment towards the Goals in the Forest Plan for Livestock Grazing (pg. 25), which includes maintenance or enhancement of plant community structure and diversity, and maintaining or restoring riparian function. |

| **Table 2:** Scoping Comments | | | |
|---|---|---|---|
| **Letter #** | **Comment/Concern** | **Type of Comment** | **Response to Comment/ How Comment was Addressed** |
| 4 | Healthy vegetation and soils improve water infiltration and nutrient cycling; resist wind and water erosion of soils; enhance forage production; and protect water resources, wildlife habitat, and other values. Livestock grazing, roads, off-road vehicle use, and other land uses (e.g.; recreation uses) can adversely affect ecosystem functions and forage production, particularly such uses on sensitive soils. Grazing generally is intensive along fence lines, trails, roads, watering areas, and bedding areas. Soil compaction and overuse of forage is common in these and other areas where livestock naturally congregate. Erosion, gully formation, incision of natural and created channels, and sedimentation of nearby waters are common impacts in overused areas. The EIS should identify such areas and propose protection and restoration, particularly in riparian and other sensitive areas. | Analysis | We agree. Alternative 4 was developed to provide increased protection to areas observed in the field that the IDT felt warranted additional resource protection. |
| 4 | The EPA is particularly interested in grazing effects on water quality and aquatic habitat and recommends that the EIS clearly describe water bodies within the analysis area and which will be affected by grazing activities (rivers, streams, lakes, wetlands). A good watershed map showing streams, lakes, wetlands and other surface waters in the project area in relation to grazing allotments should be included in the DEIS to allow clear understanding of water quality impacts. | Action/Analysis | We concur. Chapter 3 of the DEIS discloses the existing water bodies associated with each allotment and the aquatic habitats. See Appendix A5 for a listing of the maps for hydrology and Appendix A6 for aquatics. |
| 4 | The EPA considers the collection of baseline water quality and aquatic habitat data at the project level important to provide a comparison with estimated impacts as well as actual impacts. Where water quality and aquatic habitat information for individual water bodies exists, it should be presented. This would include inventories; baseline data information such as temperature, sediment, turbidity, channel morphological conditions, the presence of toxic substances; water quality and the existence of any known point or non-point pollution sources or other problems. The EIS should reveal what data is available and the condition (reliability, gaps in data, etc.) of that information. | Actions/Analysis | As identified in Chapter 3 and Appendix B of the DEIS, the data for water quality and aquatic habitat is discussed and disclosed in the Hydrology and Aquatic sections. |

| **Table 2:** Scoping Comments | | | |
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| **Letter #** | **Comment/Concern** | **Type of Comment** | **Response to Comment/ How Comment was Addressed** |
| 4 | Much of the information provided in the water quality/aquatics or watershed section can, and should, be correlated to fisheries resources. Fisheries information such as fish species present, populations, and important fisheries habitats such as spawning gravels, over-wintering pools, stream bed and bank conditions that affect fisheries habitat such as undercut bank habitat, riffle/pool ratios, substrate conditions, vegetative cover, availability of large woody debris, and the potential of the streams to support threatened, endangered, or sensitive fish species should be described. | Analysis | Chapter 3 of the DEIS Aquatics section, these items are discussed and disclosed. |
| 4 | The EIS should identify both current and projected impacts from proposed grazing activities on water quality, fish and riparian habitat, reductions in habitat capability due to grazing, spawning and rearing habitat, etc. | Action/Analysis | Chapter 3 of the DEIS Aquatics section discusses and discloses this information. |
| 4 | Watersheds and hydrologic conditions should be described in terms of water quality, quantity, stream morphology, aquatic life, beneficial uses (e.g., fisheries, public water supply, irrigation) and beneficial use support, and status of proper functioning condition. | Action/Analysis | Chapter 3 of the DEIS Hydrology section discusses and discloses this information. |
| 4 | Identify any existing conditions or activities adversely affecting watershed characteristics. These might include stream bank disturbance from livestock, road related sedimentation, or natural slumping. Watershed or stream restoration or fisheries enhancement projects that are proposed as part of the project alternatives should be clearly described. | Action/Analysis | Chapter 3 of the DEIS has a table that list by decade and land ownership past, present, and reasonably foreseeable future activities within the project area. This list is used by each resource including Hydrology to identify those activities that contributed to the existing condition and that will be used in their cumulatively effects analysis. |
| 4 | WQS are established by States, but must be reviewed and approved by EPA in accordance with 40 CFR Part 131. Montana WQS are found in the Administrative Rules of Montana (ARM) 17.30 Subchapter 6, and the Montana Non-degradation rules are found in ARM 17.30 Subchapter 7. Montana's Non-degradation Rules are intended to assure that existing high surface water quality and designated water uses will not be degraded | Statement, no cause-effect | Thank you for your comment and reference. As discussed in Chapter 3 of the DEIS in the Hydrology section, the applicable state water quality standards will be followed. |

| **Table 2:** Scoping Comments | | | |
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| 4 | Existing Water Quality Standards applicable to the affected water bodies should be presented to provide a basis for determining whether beneficial uses will be protected and water quality standards met. Other information relevant to the analysis, such as aquatic species habitat and the condition and productivity of that habitat, should also be included (e.g., effects on stream banks, channel stability, streambed substrate including seasonal and spawning habitats, riffle and pool habitat, large woody debris, stream bank vegetation, and riparian habitats). | Analysis | Chapter 3 of the DEIS on the Hydrology and Aquatics section discuss and disclose this information. |
| 4 | The analysis should disclose whether the project will cause any reductions in habitat capability or impair designated uses. | Analysis | Chapter 3 of the DEIS Aquatics section discusses and discloses this information in their analysis section. The Hydrology section of Chapter 3 discusses and discloses designated uses information and uses it in their analysis section. |
| 4 | Special attention should be made regarding Montana's identification of water bodies with impaired uses in their Clean Water Act Section 303(d) report. The EIS should identify water bodies in the analysis area listed by the Montana Dept. of Environmental Quality (MDEQ) as water quality impaired under Section 303(d) of the Clean Water Act (see http://cwaic.mt.gov/), as well as the magnitude and sources of such impairment. | Action/Analysis | Chapter 3 of the DEIS in the hydrology section there is a discussion of the 303d listed streams and a map in Appendix A5. |
| 4 | All impaired waters in the project area should be identified in the DEIS. It is likely that proposed activities have potential to affect sediment/siltation and turbidity in project area streams. Stream segments designated as "water quality impaired" and/or "threatened" listed on State 303(d) lists require development of a Total Maximum Daily Load (TMDL). We encourage review of MDEQ's guidance document" Understanding TMDL's Pamphlet" which can be downloaded at, http://deg.mt.gov/wginfo/TMDL/default.mcpx. | Action/Analysis | Thank you for your comment and reference. As discussed in Chapter 3 of the DEIS in the Hydrology section, the applicable state water quality standards will be followed. |

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| 4 | Pending completion of a TMDL in Montana, new and expanded nonpoint source activities may commence and continue, provided those activities are conducted in accordance with (MCA 75-5-703). The Administrative Rules of Montana (17 .30.602) deme these as "methods, measures, or practices that protect present and reasonably anticipated beneficial uses." "Reasonable soil, land and water conservation practices" include but are not limited to structural and nonstructural controls and operation and maintenance procedures. Appropriate practices may be applied before, during, or after pollution producing activities. It is important to note that "reasonable soil, land and water conservation practices" are differentiated from BMPs, which are generally established practices for controlling nonpoint source pollution. BMPs are largely practices that provide a degree of protection for water quality, but may or may not be sufficient to achieve Water Quality Standards and protect beneficial uses. "Reasonable soil, land and water conservation practices" include BMPs, but may require additional conservation practices, beyond BMPs to achieve Water Quality Standards and restore beneficial uses. | Action/Analysis | Thank you for your comment and reference. As discussed in Chapter 3 of the DEIS in the Hydrology section, the applicable state water quality standards will be followed. |
| 4 | The EIS should describe how the proposed project might affect impaired water bodies, particularly how the water quality parameters causing the impairment and 303(d) listing may be affected. | Analysis | Chapter 3 of the DEIS Hydrology section discusses and discloses this information. |
| 4 | It is EPA's policy that proposed activities in the drainages of 303(d) listed streams should not cause further degradation of water quality, and should be consistent with the State's TMDL's and water quality restoration plans. Such consistency means that if pollutants may be generated during project activities, mitigation or restoration activities should also be included to reduce existing sources of pollution to offset or compensate for pollutants generated during project activities in accordance with the TMDL and long-term restoration plan. | Action/Analysis | Chapter 3 of the DEIS Hydrology section discusses and discloses this information. Several of the proposed actions such as fencing, will help to decrease livestock from trampling the banks and adding sediment to the existing 303(d) streams. |

| **Table 2:** Scoping Comments | | | |
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| 4 | Recognizing uncertainties and desiring a margin of safety, such compensation should more than offset pollutants generated, resulting in overall reductions in pollution consistent with long-term water quality improvement and restoration of support of beneficial uses. Watershed restoration activities that compensate for pollutant production during management activities in watersheds of 303(d) listed streams should also be implemented within a reasonable period of time in relation to pollutant producing activities (e.g., 5 years). | Action/Analysis | Although the Purpose and Need does not include a restoration component, we believe that the actions proposed in Alternative 4 and the Proposed Action will help move each allotment towards the Goals in the Forest Plan for Livestock Grazing (pg. 25) and improve the 303(d) listed streams in the project area. |
| 4 | We recommend that the Beaverhead-Deerlodge NF coordinate with Montana DEQ TMDL program staff to assure consistency of proposed grazing management actions with TMDL's and Water Quality Plans being prepared by MDEQ (contact MDEQ staff such as Mr. Dean Yashan at 406-444-5317, and/or Mr. Robert Ray at 406-444-5319). | Action/Analysis | As outlined in the Forest Plan on page 16, the Forest cooperates with state, tribal and other organizations in the development and implementation of TMDL's. |
| 4 | Actions often recommended to address TMDL goals to improve water quality include: *properly maintain forest roads and implement road BMPs *decommission forest roads that are surplus to the needs of management and access *upgrade undersized culverts be upgraded to better accommodate large floods and/or realign culverts to provide fish passage, *minimize new road construction and particularly road stream crossings *locate roads away from streams and riparian areas as much as possible *improve grazing management *use adequate BMPs be used on all timber harvest operations *emphasize use of less disturbing harvest methods that minimize ground disturbance and erosion potential (skyline, helicopter, logging on snow or frozen ground) *provide adequate riparian buffers (conform to lNFISH standards) *address other existing sediment sources to streams such as unstable streambanks. | Actions | As outlined in the Forest Plan on page 16, the Forest cooperates with state, tribal and other organizations in the development and implementation of TMDL's. |

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
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| 4 | Executive Order 11990 requires that Federal Agencies "take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities ... " and agencies are further directed to "avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds ( 1) that there is no practicable alternative to such construction, and (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use ... ". The EIS should describe how the alternatives will meet the wetland protection goals in EO 11990. Executive Order 11990 requires Federal agencies to protect both jurisdictional and non-jurisdictional wetlands. | Analysis | As outlined in Chapter 3 of the DEIS in the Hydrology section, this project will comply with all applicable laws, regulations, and policies, including Executive Order 11990. |
| 4 | The EIS should describe existing wetlands and riparian areas in the analysis area; their acreage, type, and ecological function. | Action/Analysis | See Chapter 3 of the DEIS, hydrology section for a description of the project areas wetlands and riparian areas. |
| 4 | Riparian and wetland areas should be described in terms of size, location, percent of analysis area, function, value, and condition. This should include the following attributes: hydrogeomorphic, vegetation, erosion/deposition, soils, and water quality. | Analysis | See Chapter 3 of the DEIS, hydrology section for a description of the project areas wetlands and riparian areas. |
| 4 | The status of riparian and wetland Proper Functioning Condition (PFC) should be described along with their current ecological status and trend. The Bureau of Land Management technical references TR 1737-9 "Process for Assessing Proper Functioning Condition", and TR 1737-11 "Process for Assessing Proper Functioning Condition for Lentic Riparian Wetland Areas" are available to assist in PFC determination. | Action/Analysis | See Chapter 3 of the DEIS, hydrology section for a description of the methodology for determining Proper Functioning Condition (PFC). |
| 4 | Livestock grazing, vegetative browsing, road construction and vegetation clearing, and other disturbances may result in riparian and hydrologic impacts. Grazing can promote changes to surface and subsurface drainage patterns that can ultimately lead to changes in wetland integrity and function. Wetland impacts should be avoided, and then minimized, to the maximum extent practicable, and then unavoidable impacts should be compensated for through wetland restoration, creation, or enhancement. | Action/Analysis | The Proposed Action and Alternative 4 provide actions increase protection for riparian and wetland areas. At this time there are no wetlands identified as needing restoration, creation or enhancement. |

| **Table 2:** Scoping Comments | | | |
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| 4 | For your information, EPA has identified general recommendations for "National Management Measures to Protect and Restore Wetlands and Riparian Areas for the Abatement of Nonpoint Source Pollution" at http://www.epa.gov/owow/nps/wetmeasures/pdf/guidance.pdf. | Statement, no cause-effect | Thank you for this reference. See the hydrology section in Chapter 3 of the DEIS for how this information was covered. |
| 4 | Within the Interior Columbia Basin EPA evaluates land management activities for consistency with the provisions of the Interagency Memorandum of Understanding between the Forest Service, BLM, EPA, USFWS, and NMFS for Forest Service implementation of the Interior Columbia Basin Strategy on National Forest lands (referred to as the ICB Strategy, see http://www .icbemp. gov/html/icbstrat.pdf , and http://www .icbemp.gov/html/aqripfrm7804.pdf ). | Statement, no cause-effect | The revised Forest Plan for the Beaverhead-Deerlodge NF took this MOU into consideration during the revision. This project reflects those considerations through meeting the applicable Forest Plan Standards. |
| 4 | Riparian Habitat Conservation Areas (RHCAs) are an important management element in the ICB Strategy to maintain and restore the health of watersheds, riparian, and aquatic resources to sustain aquatic and terrestrial species and provide water of sufficient quality and quantity to support beneficial uses. We support RHCA buffer zones to avoid adverse impacts to streams, wetlands and riparian areas. | Action/Analysis | With the site specific Allowable Use Levels (AUL's) and the standards in the 2009 Forest Plan, we believe riparian and wetland health will be maintained or moved towards a healthier state. |
| 4 | The EIS should describe how grazing management will be monitored, evaluated and adjusted over time to achieve desired conditions and protect the environment. | Action/Analysis | As identified in Chapter 2 of the DEIS, under the Proposed Action and Alternative 4, each allotment will have monitoring. Some will also be a part of the Forest Wide monitoring of upland and wetland areas. The information from this monitoring will be used during the development of the Annual Operating Instructions (AOI) |
| 4 | Principles of adaptive management should be used to develop and implement allotment management plans. The EIS should consider: (1) specific resource objectives, (2) minimum thresholds for ecosystem and forage health (particularly in riparian areas, critical wildlife habitats, and important recreation areas), (3) a monitoring plan that provides sufficient evaluation of the impacts from allotment management plans, and (4) measures that can be adopted should there be unexpected impacts from land management practices or from drought, catastrophic fire, noxious weed infestation, or other unforeseeable events. | Action/Analysis | As discussed in Chapter 2, the identified alternatives consider different options for meeting the standards in the 2009 Beaverhead-Deerlodge National Forest. The development of the Site Specific Allowable Use Levels allows for needed adjustments based on the site specific standards that is outlined in the Annual Operating Instructions. |

| **Table 2:** Scoping Comments | | | |
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| 4 | The monitoring plan should identify the purpose of the monitoring, what questions are to be answered by monitoring, what resource conditions are to be monitored, who will do the monitoring, when and how often it will be done, what conditions will initiate additional measures if needed, and how reporting and feedback will be implemented and used. Of particular concern for the long-term monitoring is identification of benchmark conditions to be monitored to determine relative progress toward a desired condition, and what conditions might lead to a change in the management strategy. | Action/Analysis | Chapter 2 of the DEIS outlines the monitoring that is common to all action alternatives. Needed adjustments are outline in the Annual Operating Instructions that in part is based on review of the previous year's monitoring for the short term and long term. Chapter 3 of the DEIS, under each resource is disclosed any benchmark conditions. |
| 4 | To the extent possible, there should be details in the monitoring plan about the types of surveys, location and frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in project implementation, and availability of results to interested and affected groups. Feedback should allow comparison of baseline data with monitoring results to adjust standard operating procedures, monitoring intensity, and protocols promptly when adverse effects occur, to ensure that mitigation strategies will improve in the future and that unforeseen adverse effects are identified and minimized. | Analysis | Chapter 2 of the DEIS outlines the monitoring that is common to all action alternatives. |
| 4 | Indicators should be developed for not only fish, wildlife, and vegetative species but also for resources such as vegetative structure, soils, and recreation amenities, and introduced species such as noxious weeds or alien predators. | Analysis | Chapter 3 of the DEIS outlines for each resource the resource indicators that will be used for the analysis and the units of measures. |
| 4 | A management indicator species (MIS) list should be maintained to assist in achieving a baseline and working toward management objectives. A MIS list should focus on aquatic and terrestrial animal and plant species and other important factors that contribute to the success of livestock management, biodiversity, and species' viability. | Analysis | The 2009 Forest Plan outlines the MIS list for the applicable resources, i.e. aquatics page 16, wildlife page 47. |

| **Table 2:** Scoping Comments | | | |
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| 4 | For range management, there appears to be three distinct purposes for monitoring. The first is to determine annual management actions to be taken, such as movement of animals within or between pastures. The second reason is to determine the overall trend of the range, water, and related conditions over time. The third reason is to validate predictions made during the analysis process and measure the effectiveness of the mitigation measures (quantitatively-if possible, and/or a qualitatively), and determining the need for modifying mitigation or adding mitigation measures. | Statement, no cause-effect | We agree. We believe that the monitoring outlined for this project allows will provide information for all three purposes. |
| 4 | A well-designed monitoring plan demonstrates how well the preferred alternative resolves the identified issues and concerns by measuring the effectiveness of mitigation measures to control or minimize adverse effects. | Statement, no cause-effect | We agree. We believe that the monitoring outlined in Chapter 2 of the DEIS for this project will allow us to identify concerns and make adjustments in a timely way. |
| 4 | The EIS should address how management actions will track unforeseen, adverse environmental impacts to sensitive natural resources and how they can or will be avoided or mitigated. | Analysis | Chapter 3, in the Range, Aquatic, Botany, Range, and Wildlife sections outline how impacts to sensitive natural resources will be addressed and the appropriate mitigation. |
| 4 | The effectiveness of grazing, fire treatment, and other management practices should be addressed for critical environmental receptors such as keystone plant and animal species and sensitive vegetation, wildlife, and fish (including endangered, threatened, or rare species). | Action/Analysis | Chapter 3 of the DEIS covers this in each of the resource sections. |
| 4 | The USFS should also identify resource needs to carry out its proposed monitoring program. There may also be a need for enforcement activities if illegal grazing on public lands occurs or if other unallowable land uses such as use of motorized vehicles off of designated roads and trails occurs, or vandalism, or intentional introduction of nonnative species, and other land uses degrade public land and resources. | Action | The monitoring section of Chapter 2 outlines the applicable monitoring including methodology. |

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| 4 | We encourage the Beaverhead-Deer!odge NF to contact the Montana Dept. of Environmental Quality (MDEQ) in Helena to obtain information and guidance for developing grazing monitoring programs (e.g., the document "Monitoring Protocols for Success"). Appropriate grazing monitoring programs generally include evaluation of effects upon: • Stream Channels - width/depth ratios, channel down cutting/changing water table, stream bottom sedimentation<br>• Stream Banks -bank stability, riparian vegetation/species, percent cover, vigor<br>• Water Quality- dissolved oxygen, fecal coliform, temperature, nutrients, fish population and habitat, macroinvertebrate bioassessments<br>• Forage/Woody Utilization- stubble height, woody browse use<br>• Wildlife Use | Action/Analysis | Thank you for the recommendation. As outlined in the BDNF 2009 Forest Plan, we will coordinate with the MTDEQ on all applicable projects. |
| 4 | Aquatic/water quality effectiveness monitoring activities that have been, are, or will be, carried out to evaluate the proposed project's effects on 303(d) listed streams should also be summarized. | Analysis | Chapter 3 of the DEIS, Hydrology and Aquatic sections discuss and disclose this information. |
| 4 | We recommend that the EIS describe the Potential Natural Community (PNC) of riparian areas, upland sites, and critical habitats such as subalpine areas and wetlands. | Analysis | This information is discussed and disclosed in Chapter 3 of the DEIS in the Soil and Range sections. |
| 4 | Vegetative communities, upland and riparian habitat, forage utilization and conditions, rare and sensitive plants, and noxious weed conditions should be described. Indicate the ecological status of these sites and the successional direction (trend) in which these sites are moving. | Analysis | This information is discussed and disclosed in Chapter 3 of the DEIS in the Range and Invasive Plants, Botany, Hydrology, and Soil Sections. |
| 4 | If the Desired Condition of these sites is different from the existing condition or the PNC, this desired condition should be described and an explanation given as to why this is different from the PNC. | Analysis | This information is part of the discussion of the existing condition found in Chapter 3 of the DEIS. |
| 4 | A ground survey should be conducted prior to issuance of a Final Environmental Impact Statement (FEIS) to document the presence of any rare and/or sensitive plant species or their habitat. | Analysis/Action | The Botany Section in Chapter 3 of the DEIS outlines the field data collection and review for sensitive plants. |

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
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| 4 | Weeds and non-native plants may reduce biological diversity and threaten sensitive fish and wildlife species populations. Many noxious weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem, such as road building, fire, logging, or domestic livestock grazing activities. Livestock grazing has been identified both as (1) a cause of invasion or spread of noxious weeds and (2) a tool to suppress the spread of weeds once they already have been established. Activities that introduce and distribute nonnative plants continue to proliferate on many public lands. Weed prevention is both cheaper and more effective than restoration practices and should be pursued within the constraints of future actions by industry and other Federal agencies. | Action | This information is discussed and disclosed in Chapter 3 of the DEIS in the Range and Invasive Plants Section. |
| 4 | The Beaverhead-Deerlodge NF should work with other landowners adjacent to the Forest to prevent weed infestations from adjacent lands adversely affecting Forest lands and similarly to monitor, prevent, and control. weed infestations on the Forest. | Action | As identified in Chapter 3, in the Range and Invasive Plants section, this project will follow the direction outlined in the 2002 Beaverhead-Deerlodge National Forest Noxious Weed Control Environmental Impact Statement and Record of Decision. |
| 4 | EPA fully supports control of noxious weed infestations, particularly integrated weed management (e.g., effective mix of cultural, education and prevention, biological, mechanical, chemical management, etc.). | Statement, no cause-effect | Thank you for your support of controlling noxious weeds. See Ch. 3, Range and Invasive Plants section for details. |
| 4 | The EIS should identify the noxious weeds and exotic plants that occur in the resource area, and include a strategy for prevention, early detection of invasion, and control of weeds. | Action/Analysis | As identified in Chapter 3, in the Range and Invasive Plants Section, the list of noxious weeds and invasive plants can be found. The project will follow the direction outlined in the 2002 Beaverhead-Deerlodge National Forest Noxious Weed Control Environmental Impact Statement and Record of Decision. |
| 4 | We encourage tracking of weed infestations, control actions, and effectiveness of control actions in a central weed database. Weed prevention is the most cost effective way to manage and control weeds by avoiding new infestations and spread of weeds, and thus, avoiding the need for subsequent weed treatments. | Analysis | This project will be following the direction for follow up in the 2002 Beaverhead-Deerlodge National Forest Noxious Weed Control Environmental Impact Statement and Record of Decision. |

**Table 2:** Scoping Comments

| Letter # | Comment/Concern | Type of Comment | Response to Comment/ How Comment was Addressed |
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| 4 | Weed-control strategies should include the use of weed-free certified hay, weed-free certified fill for road repair, weed-free certified seed for replanting, education, and other strategies. | Actions | This project will be following the direction for follow up in the 2002 Beaverhead-Deerlodge National Forest Noxious Weed Control Environmental Impact Statement and Record of Decision. |
| 4 | While we support use of herbicides for weed control where needed, we encourage prioritization of management techniques that focus on non-chemical treatments first, with reliance on chemicals being the last resort, since herbicides can be toxic and have the potential to be transported to surface or ground water following application. Herbicide drift into streams and wetlands could adversely affect aquatic life and wetland functions such as food chain support and habitat for wetland species. Water contamination concerns of herbicide usage be evaluated and mitigated. | Action | This project will be following the direction for follow up in the 2002 Beaverhead-Deerlodge National Forest Noxious Weed Control Environmental Impact Statement and Record of Decision. |
| 4 | EPA recommends that no herbicide spraying occur in streams and wetlands or other aquatic areas (seeps, springs, etc.). Herbicides should be applied at the lowest rate effective in meeting weed control objectives and according to guidelines for protecting public health and the environment. The Montana Water Quality Standards include a general narrative standard "requiring surface waters to be free from substances that create concentrations which are toxic or harmful to aquatic life." Please also note that there may be additional pesticide use limitations that set forth geographically specific requirements for the protection of endangered or threatened species and their designated critical habitat. This information can be found at http://www .epa.gov/espp/bulletins.htm . | Action/Analysis | This project will be following the direction in the 2002 Beaverhead-Deerlodge National Forest Noxious Weed Control Environmental Impact Statement and Record of Decision. |
| 4 | For your information, the website for EPA information regarding pesticides and herbicides is http://www.epa.gov/pesticides/. The National Pesticide Telecorrrrnunication Network (NPTN) website at http://nptn.orst.edu/tech.htm which operates under a cooperative agreement with EPA and Oregon State University and has a wealth of information on toxicity, mobility, environmental fate of pesticides that may be helpful (phone number 800-858-7378). | Statement, no cause-effect | Thank you for the references. See Ch. 3, Range and Invasive Plants section for details. |

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| 4 | If the proposed activities could affect threatened or endangered (T & E) species (e.g., grizzly bear, bull trout, wolf, lynx, etc.) the draft and final EIS should include the Biological Assessment and the final EIS should include the associated FWS Biological Opinion or formal concurrence for the following reasons: 1. NEPA requires public involvement and full disclosure of all issues upon which a decision is to be made; 2. The Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA strongly encourage the integration of NEPA requirements with other environmental review and consultation requirements (40 CFR 1502.25); and 3. The Endangered Species Act (ESA) consultation process can result in the identification of mandatory, reasonable, and prudent alternatives which can significantly affect project implementation. | Analysis | As identified in Chapter 3 of the DEIS for Aquatics, Botany, and Wildlife, the appropriate tool for analysis and disclosure with respect to Threatened or Endangered plants or animals will be used. |
| 4 | The potential effects on listed species are relevant to forest management activity decisions. Since both the Biological Assessment and the EIS must evaluate the potential impacts of the project on listed species, they can jointly assist in analyzing the effectiveness of project alternatives and mitigation measures. EPA recommends that the final EIS and Record of Decision not be completed prior to the completion of ESA consultation. If the consultation process is treated as a separate process, the Agencies risk FWS identification of additional significant impacts, new mitigation measures, or changes to the preferred alternative. If these changes have not been evaluated in the final EIS, a supplement to the EIS would be warranted. | Analysis | Thank you for your recommendation on the use of information from an ESA consultation. This project will follow the appropriate process for consultation with the Fish and Wildlife Service for Threatened and Endangered plants or animals. |
| 4 | Grazing in areas of early or mid seral ecological status may lead to a reduction of biodiversity through habitat destruction, simplification, or fragmentation. In consideration of this, EIS analysis should include a quantitative assessment of the variety, abundance, and distribution of plant and animal populations and the ecologic processes through which they interact. Such a discussion should be presented on an ecosystem, or regional basis as well as specific to the analysis area. | Analysis | Chapter 3 of the DEIS discusses and discloses the effects of livestock grazing to terrestrial and aquatic plant and animal populations. |
| 4 | Biodiversity has become a significant issue in the northern Rocky Mountains. Maintenance of biodiversity can minimize the need for listing species as threatened or endangered. Upland and stream corridors should be retained in the planning area to help maintain genetic diversity. | Action | This project does not propose any modifications or changes to existing upland or stream corridors. |

| **Table 2:** Scoping Comments | | | |
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| 4 | Biodiversity may be an important consideration when special habitats (i.e., wetlands, threatened and endangered species habitat) will be affected. The state of the art for this issue is changing rapidly. CEQ prepared guidance entitled, "Incorporating Biodiversity Considerations Into Environmental Impact Analysis Under the National Environmental Policy Act," http://ceg.hss.doe.gov/publications/incomorating biodiversity.html. | Statement, no cause-effect | Thank you for the reference. This is discussed and disclosed in the Range, Botany, and Wildlife sections of Chapter 3 of the DEIS. |
| 4 | For potential multiple use opportunities to be fully realized, the relatively higher values for human visitation and wildlife habitats should be recognized within areas that are designated for visitation and recreation. A breakdown of the economic, cultural, and biological values in areas that are proposed for grazing would be helpful to the affected public groups and to decision-makers. | Analysis | Thank you for the recommendation. This project is not to determine the possibility of multiple use. The decision was made during the 2009 Forest Plan revision. Chapter 3 of the DEIS, Social, Economic, and Wildlife sections discuss and disclose the resource. |
| 4 | NEPA requires that cumulative impacts be addressed as a summary of the individual impacts of this and all other past, present, and "reasonably foreseeable" future projects, including activities on private adjacent land irrespective of what agency/entity has decision-making authority or analysis responsibility. In January 1997 the President's Council on Environmental Quality (CEQ) published, "Considering Cumulative Effects Under the National Environmental Policy Act", guidance that provides a framework for analyzing cumulative effects. In May 1997 EPA published a document entitled, "Consideration of Cumulative Effects in EPA Review of NEPA Documents." This document can be found at http:/lwww.epa.gov/compliance/resources/policies/nepalindex.html (Click on cumulative effects document title). | Statement, no cause-effect | Thank you for the references. Please see Chapter 3 of the DEIS for a discussion of cumulative effects for each resource. |

**Table 2:** Scoping Comments

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| 4 | EPA considers the following to be key steps in the development of adequate cumulative effects analyses: 1) Determine resources or ecosystem components resources most likely to be significantly impacted. Use appropriate analysis area boundaries for the resource and time period over which the cumulative effects have occurred or will occur. 2) Identify other past, present, and reasonably foreseeable future actions that have had or are expected to have impacts in the same area. Projects or activities evaluated should include those undertaken by all entities on all land ownerships in the analysis area. The baseline condition of the resources of concern should include a description of how conditions have changed over time and how they are likely to change in the future with and without the proposed action (include adequate evaluation vs. benchmark or baseline or reference conditions; include scientifically defensible threshold levels). 3) Expected impacts should be evaluated, regardless of the agency (Federal or non-Federal) or person that undertakes such actions. All the direct and indirect effects that are known, should be identified, a good faith effort should be made to explain the effects that are not known but are reasonably foreseeable. 4) Good cumulative effects analysis requires close coordination among agencies and the public to ensure that all past, present and reasonably foreseeable future actions are considered. Reasonably foreseeable future actions need to be considered even if they are not specific proposals. Criteria for excluding future actions from analysis regards whether they are "speculative." Future actions can be excluded from the analysis if: a) the action is outside the geographic boundaries or time frame established for the cumulative effects analysis; b) the action will not affect resources of concern that are the subject of the cumulative effects analysis; and c) including the action would be arbitrary. 5) Overall cumulative impacts should be determined, and comparisons of cumulative impacts for the proposed actions and the reasonable alternatives in relation to the no action alternative and/or an environmental reference point should be provided. | Analysis | Thank you for the references. Please see Chapter 3 of the DEIS for a discussion of cumulative effects for each resource. |
| 4 | Included in the cumulative effects discussion should be some detail on the methods used to assess and predict cumulative impacts, a discussion of what is known versus what is predicted for the outside or foreseeable projects, and the level of analysis used to anticipate and predict effects for outside projects. | Analysis | Chapter 3 of the DEIS under each resource, is a section called Methodology which discusses and discloses how their cumulative effects were conducted. |

| **Table 2:** Scoping Comments | | | |
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| 4 | A summary listing of other projects occurring in the vicinity without the accompanying analysis is insufficient. | Analysis | This information is disclosed in Chapter 3 of the DEIS in a table outlining the past, present, and reasonably foreseeable future activities by land ownership. |
| 4 | The cumulative effects analysis should also include development of mitigation measures to reduce cumulative impacts. | Analysis | Chapter 2 of the DEIS discloses the list of mitigation measures that are applicable to this project. |
| 4 | Reducing cumulative effects requires repeated testing of the effectiveness of mitigation measures through monitoring. Cumulative effects analysis, therefore, should be an iterative process in which consequences are assessed repeatedly following incorporation of avoidance, minimization and compensation measures into alternatives. | Action/Analysis | We agree. As part of the monitoring disclosed for this project in Chapter 2, we believe that we will be able to assess the effectiveness of the actions. The proposed actions are ones that have been used on the Forest and by the Forest Service before and their efficacy is well known. |
| 4 | The EIS should include descriptions of current range management, including the size of allotments, number and location of pastures, number and kind of livestock, current grazing strategy, number of Animal Unit Months (AUMs) permitted, on-off periods, utilization standards, and number and kind of improvements (e.g., fencing, off stream watering). | Actions | This information is disclosed in the DEIS in Chapter 3, Range and Invasive Plants Section of the DEIS. |
| 4 | EPA suggests that the EIS disclose historic rangeland condition, comparing its current condition to past baseline conditions (pre-settlement condition and/or earlier, more degraded conditions), to evaluate how rangeland management practices have affected the resource. | Alternative | This information is disclosed in the Range and Invasive Plants Section of Chapter 3 in the description of each allotment. |
| 4 | Recreation conflicts with livestock grazing should be discussed. | Analysis | The discussion and analysis of user conflicts between recreationists and livestock grazing can be found in Chapter 3, Recreation Section of the DEIS. |
| 4 | Recreation values are enhanced for recreation activities by maintaining and restoring natural landscapes. Impacts from cattle and sheep, their manures, eroded streams, degraded springs and riparian areas, and trampled wetlands all detract from the recreation experience and will reduce both the number of visitors to the Forest and reduce the value of their experiences. Education materials should prepare recreation visitors for livestock conflicts in areas that are grazed. | Action/Analysis | At this time the forest has no educational materials specific to recreation conflicts with livestock grazing in the area. The Beaverhead-Deerlodge Forest Plan in Chapter 4, under the Management Area descriptions identifies that visitors will encounter livestock in these areas. The Wisdom and Wise River District offices can also provide information on what to expect in the area. |

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| 4 | The allotment management plans should address the number and value of recreation experiences with and without continued livestock grazing. | Action/Analysis | The number and value of recreation experiences without livestock is discussed and disclosed under the No Action Alternative in Chapter 3, Recreation Section. All other alternatives will discuss and disclose this information with livestock (See Chapter 3, Recreation Section). |
| 4 | Impacts that are not monetized should be quantified with other measures where possible or qualitatively described. For example, impacts to wildlife populations and habitat are difficult to monetize. By displaying the wildlife habitat and other natural resource benefits that now flow from grazing allotments, as well as the potential uses for both grazing and other uses, it is possible for the public and decision-makers to compare the economic benefits and costs alongside environmental and other effects. An analysis should answer the broad questions of how to best protect all human and natural resource values. Even if there is substantial uncertainty associated with the various effects, any information about the likelihood and direction of impacts would be helpful to reviewers of the document. A reasonable way to compare monetary and non-monetary impacts is a matrix that describes all impacts from various proposed actions or alternatives. | Analysis | We intend to address some financial impacts to the agency and the affected ranchers (See Chapter 3, Social/Economic Section). All other impacts will be described in other sections of the environmental analysis to address issues raised during scoping, (ones that are not monetized) and will be quantified with other measures where possible or will be qualitatively described. We will attempt to summarize the most significant financial and non-monetized impacts to demonstrate the tradeoffs expected by selecting various alternatives to help the deciding official and all reviewers of the document. |
| 4 | Livestock grazing can result in adverse effects to wildlife species native to Western lands. Elk and deer have been shown to avoid livestock grazing allotments when cattle are present and grazing itself alters their habitats, particularly when over-grazed, in winter. If areas are over-grazed by cattle during the growing season, insufficient forage may remain for native ungulates in winter and wildlife may decrease their winter use of those lands. | Analysis | Impacts to elk from this project will be analyzed in detail in the DEIS Chapter 3, Wildlife Section, including avoidance issues, and impacts to winter range |
| 4 | Impacts to both rare and more common small mammals, birds, reptiles, and other native wildlife also are likely from livestock grazing in critical wildlife habitats and those species may be significant components necessary for ecosystem and forage health. | Analysis | Impacts to small mammals, birds, reptiles, and native wildlife are analyzed in relationship to providing diversity as required by NFMA in the DEIS in Chapter 3, Wildlife Section. General effects to wildlife habitats will be addressed in the DEIS in Chapter 3, Wildlife Section. |

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| 4 | The EIS should demonstrate coordination with the U.S. Fish & Wildlife Service (FWS) and Montana Department of Fish, Wildlife & Parks (MDFWP) to address potential wildlife issues associated with the grazing alternatives including; wildlife displacement; impacts upon wildlife habitat; and impacts upon sensitive species and species of special concern (e.g., fisher, wolverine, yellowstone cutthroat trout, lynx, wolf, etc.), road access and wildlife security. | Analysis | Those agencies and people consulted with are listed in Chapter 4 of the DEIS. The outcome of those consultations and the analysis associated with wildlife issues are discussed and disclosed in Chapter 3 of the DEIS in the Wildlife Section. |
| 4 | Tradeoffs associated with various alternatives and grazing options in regard to effects on wildlife and their habitats should be described. For example, understanding the effects of livestock forage removal and competition with native wildlife is important information, needed by DEIS reviewers to understand the potential impacts to native wildlife species. | Analysis | Impacts to native wildlife are analyzed in relationship to providing diversity as required by NFMA in the DEIS (See Chapter 3, Wildlife Section). General effects to wildlife habitats will be addressed in the DEIS, Chapter 3 Wildlife Section. |
| 4 | A landscape scale perspective is generally appropriate to evaluate wildlife habitats and impacts unless the presence of biotic species that inhabit a wide range of landscapes indicates a need for a larger scale (e.g., wide-ranging predators or neo-tropical birds). Where indicator species are used, they should be representative of discrete, specific habitats or conditions. | Analysis | The temporal and spatial scale of analysis will be addressed in detail in the DEIS Chapter 3 for each resource. Indicator species as identified in the Forest Plan will be address where habitat is present. |
| 5 | The proposal is to manage based on PFC. I don't know if PFC has been done on the length of streams on the allotment making the AUL as proposed unknown. | Analysis | See Hydrology Section in Chapter 3 of the DEIS for stream monitoring methodology and protocol. |
| 5 | The proposed actions are written to restrictive in their effects on the management of the resources. | Analysis | The actions were proposed to help maintain and where appropriate improve the resources such as soil, water, and vegetation. |
| 5 | A proposed number of cow calf pairs of 250 should be a range from 125 to 300 to allow changes in stocking density. | Alternative | Thank you for your comment. Flexibility can be outlined through the Annual Operating Instructions (AOI) process. The permitted numbers which are the maximum numbers allowed are listed and used in the analysis. |
| 5 | A limit of 53 days should be unnecessary with a head month limit. | Alternative | We concur with your statement. As identified in the DEIS in Chapter 2, we list the maximum number of days to be used within the SOU and allow the permittee to decide when the best time would be to use the 53 days. |
| 5 | The documentation of cow calf doesn't allow bulls to be turned out or dry cows in the way this document reads (440 Head Months). | Alternative | The permitted numbers includes cows, calves, bulls, dry cows, horses, etc. This will be made clear in the narrative of actions common to all action alternatives. |

| **Table 2:** Scoping Comments | | | |
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| 5 | There are only 3 water tanks on the allotment. | Statement, no cause-effect | We concur with your statement. This has been clarified to show that there is one solar pump without a separate tank. The water is pumped up to one tank and gravity fed to another. |
| 5 | Exclosure's - There was one at Pintler Creek campground. The exclosure around the camp ground was destroyed by bug kill timber removal. | Statement, no cause-effect | The fence existing at Pintler Campground is in need of repair and it will be the Forest Service responsibility to make the repairs. |
| 5 | The small pasture with recovery of the riparian area as a goal was not meant as an exclosure or as permanent (life of wire fence about 30 yrs). | Alternative | This will be a special area used once every three years for up to 20 head months for up to 14 days with variable entry times. See Ch. 2, pgs. XX to XX allotment specific actions tables for details. |
| 5 | The proposal to build e fence to 4 wire is fine, the word permanent and exclosure are not. | Action | Use the same language that we did for Bender and Pintler that these areas will be re-evaluated for potential use at a later date based on PFC. |
| 5 | As written the proposed actions are imposable to manage for natures dramatic changes. Looser wording would be better even though it is harder to define in court. | Alternative | We have built in under Design Features/Mitigation Measure found in Chapter 2 of the DEIS, to cover those natural events such as drought and flooding. |
| 5 | There are some questions of how much fence is on the allotment. | Analysis | Describe what is included in the fence miles (boundary, exclosure, drift, etc.). |
| 6 | I feel we need to take another look at the proposal to rest every 3 years for the Ruby Creek Horse Allotment. I request a meeting with Russ and Kevin Greenwood. I would like to go and see the allotment. I feel the cut back is not needed. | Action | Meeting is in the planning |
| 7 | I am working on submitting comments on the grazing plans for these drainages. My comments will likely be a few days late since they have to go through Bozeman first. | Statement, no cause-effect | Thank you for the information. |

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| 8 | It is my opinion that riparian evaluations are not done to the PFt standards that are mentioned in your document. In your USDA /Forest Service TR1737-15 on page 16 it shows that PFC is the starting point for wildlife values and does not meet fisheries values. The goal for riparian areas should be Potential Natural Community (PNC). | Action/Analysis | We looked at the reference (USDA /Forest Service TR1737-15 on page 16) and this is not the protocol we used for this project. Proper Functioning Conditions (PFC's) for the streams within this project area were determined using the Riparian Management Objectives (RMO's) from the Forest Plan. The protocol we used to determine the hydrologic PFC is outlined in Chapter 3 in the Hydrology Section of the DEIS. PNC is a good indicator for the plant community within the riparian area, but to determine PFC for a stream reach we also need to consider channel morphology characteristics. |
| 8 | The health of riparian areas is of concern to me, and as I read through the introduction to this call for seeping comments I don't see adequate focus on this habitat. It is a given understanding that there is no more valuable habitat for wildlife than riparian areas. It is critical that riparian ecosystems be healthy. | Statement, no cause-effect | We agree that it is critical for the Riparian habitats to be healthy. The actions identified in the Proposed Action and Alternative 4 will help to maintain and where appropriate improve the habitat. Actions such as fencing, season of use changes, and the site specific Allowable Use Levels will improve protection for this habitat. |
| 8 | Sage grouse are mentioned, but no leks are mentioned, so I assume it is inferred sage grouse habitat. The sage grouse requirements are well documented, and should be evaluated as such. | Analysis | Sage grouse are discussed and analyzed in Chapter 3 of the DEIS in the Wildlife Section. At this time there are no known active leks on the Beaverhead-Deerlodge National Forest. However there are known leks outside the project area. |
| 8 | Determining PNC and ensuring that riparian areas reach PNC should be a priority and a focus on woody plant communities that exhibit vigor, multi-age, multi-species should be expected. | Action/Analysis | In this DEIS we discuss the serial stage and climax vegetation not PNC in riparian or other areas because our protocol requires us to use serial and climax. |
| 8 | Many of the streams in these allotments are 303d listed streams, and in looking at the causes of these impaired water ways·one reason for partially supporting-aquatic life and cold water fisheries is riparian grazing. Livestock need to stay out of riparian areas. The only way is to fence them out and let the riparian -areas recover. There is ample science that supports this position. | Action | We concur with your statement. As identified in the DEIS in Chapter 2 the Proposed Action and Alternative 4 identify the actions being taken to protect the riparian areas. |

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| 8 | Drought is huge, and not just this year. According to the Palmer Drought Severity Index (considered most effective for unirrigated cropland) the area of these allotments has a long history of drought. 2000-extreme drought, 2001 extreme, 2002 extreme, 2003 extreme, 2004 moderate, 2005 severe, 2006 normal, 2007 normal, 2008 normal, 2009 normal, 2010 normal, 2011 extreme, and 2012 extreme. Grazing permits as written are not responsive to these precipitation and temperature fluctuations, and although language can be written that says adjustments can be made, it is my opinion that these grazing permits should be ritten as prescriptive grazing allotments. | Analysis | As identified in the DEIS in Chapter 2 of the DEIS, under Design Features/Mitigation Measures, we have accounted for the different natural changes such as drought and flooding to make changes. |
| 8 | Monitoring of riparian should be data driven, not an ocular estimation. | Analysis | Please see the methodology section in the Range Section of Chapter 3 for monitoring of riparian areas. |
| 9 | **Governor Creek and tributaries:** Upper Governor Creek and tributaries including Indian Creek and unnamed tributaries harbor some the last remaining Westslope cutthroat trout populations in the upper Big Hole. Trampling of cutthroat redds may be an issue in these streams if livestock use overlaps with the incubation period of cutthroat eggs. These streams are also particularly sensitive to the potential impacts from grazing because of their low gradient meadow-like nature, as water is scarce later in the season and the lush grass of the riparian areas is attractive to livestock. Further, there are few willows or other woody vegetation to provide bank stability or cover for fish. Grazing Plans in this area should take these considerations into account to reduce potential impacts to cutthroat trout. Riparian exclosure fences, alteration of the timing of use, or other measures may be necessary to reduce potential impacts to these streams and cutthroat trout. | Actions | Thank you for your comment. Based on our review of the temperature data and modeled redd trampling, under Alternative 4 we have proposed an avoidance period of 7/1-8/25 for pasture 4, which includes Governor Creek, and Indian Creek. See the DEIS Ch. 2, for Alternative 4 details and in the Aquatics Section of Ch. 3 for analysis. |
| 9 | FWP encourages the Forest Service to continue to actively monitor grazing activities to ensure the proposed grazing plans satisfy the Forest Service's aquatic and riparian standards. If they do not, then we ask that you make necessary modifications to the grazing plans so that these standards can be met in the future. | Actions | Monitoring is part of the project as identified in the Proposed Action in Chapter 2 of the DEIS. The information will be used to remove the livestock or make additional changes in the Annual Operating Instructions. |

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| 9 | FWP further encourages the Forest Service to seek ways to limit livestock impacts to riparian areas through fencing, development of off-stream watering sources and modifying use patterns including the timing of use, rest-rotation and number of AUMs to reduce potential impacts to aquatic and riparian resources. | Actions | As disclosed in the Proposed Action and Alternative 4, five allotments will have new infrastructure (fencing, water, etc.), seven will have changes in grazing systems, the Season of Use (SOU) will be reduced on five allotments, and the Head Months will be decreased on seven allotments from 8,365 to 5,666 total. |
| 9 | Three years ago, FWP split Deer/Elk Hunting District 321 into two districts along Highway 43 between Wisdom and Chief Joseph Pass. The district north of this line to Pintler Creek is now Hunting District 334. Table 1 on page 4 of the scoping document should be updated to reflect this. Specifically, where Hunting District 321 is listed for Pintlar Creek and Mussigbrod Allotments, this should be changed to Hunting District 334. | Action | The Hunting units identified are those reflected in the 2009 Beaverhead-Deerlodge National Forest Land and Resource Management Plan (Forest Plan). For analysis purpose those are the units that will be used. In the DEIS in the Wildlife Section in Chapter 3, we have disclosed the change and how it was used in this project. The table was updated to reflect the change in Hunt Units. |
| 9 | Due to the fact that birds and small mammals can sometimes be trapped and drowned in water tanks, FWP recommends that any new tanks be fitted with wildlife escape ramps and existing tanks be retro-fitted with ramps. There are numerous designs and information that could be found on the internet about this mitigation measure. | Action | Thank you for your comment. Design feature number 1, 6, and 7 in Chapter 2 of the DEIS, has been updated to reflect this information for new and existing water features. |
| 9 | Where new fencing is to be constructed, FW P encourages the use of fencing that allows for big game passage and movement. Vanna Boccadori, Butte Area Wildlife Biologist, is available for field site visits and consultation to assist in this effort. | Action | Thank you for your comment. Design feature number 9, in Chapter 2 of the DEIS, identifies the direction the Forest follows for big game movement. |
| 9 | **Pintlar Creek:** near the upstream end of Pintlar Meadows there is significant bank instability and erosion. While it is unclear if the cause of this instability and erosion is grazing related, the current use by livestock is not aiding in the recovery of the area. FWP recommends the riparian area in this reach of stream be excluded from grazing through fencing or other means in the upper reaches of the meadow to allow the stream banks to revegetate. Active measures such as recontouring banks and planting willows and other vegetation may expedite the recovery of the area. It should be a high priority for restoration since this area is within the Anaconda-Pintlar Wilderness. | Actions | Thank you for your comment. Alternative 4 as described in the DEIS in Chapter 2, proposes to close this portion of the Pintlar for 10 years by reconstructing the existing fence. This will give this area and other stream banks time to begin recovery. |

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| 9 | **York Gulch:** a riparian exclosure fence was constructed on York Gulch to keep cattle from accessing the riparian area of the stream. This fence, however, has not been effective at keeping cows out. It is unclear how cattle are gaining access to the stream, but this fence needs to be repaired and/or modified so it effectively excludes cattle from the stream. The fence also needs to be maintained and monitored each year to prevent cattle from entering the exclosure and to remove cattle that find their way in. | Actions | This is an improvement maintenance compliance issue and is covered through term grazing permit terms and conditions, and annual compliance monitoring. If cow's are continuing to access this area we will follow the process outlined in the Forest Service Handbook for Grazing Administration. If the cows are accessing the area from private lands, it will be covered under our 36 CFR 261.7, for trespass regulations for livestock grazing. |